

THE BEKAERT POLICY ON CONFLICT MINERALS

1. PURPOSE OF THE PROCESS/PROCEDURE/INSTRUCTION

Bekaert is committed to use raw materials of legal and sustainable origin. Bekaert refrains from sourcing conflict minerals as these contribute to the financing of armed conflicts and enable human rights abuses. Bekaert maintains due diligence processes to achieve compliance with this commitment and requests relevant suppliers to fully support Bekaert in this respect.

2. MOTIVATION FOR CHANGE

New document

3. SCOPE

The Bekaert Policy on Conflict Minerals is mandatory for all suppliers delivering 'conflict minerals' to the Bekaert Group.

The Bekaert Policy on Conflict Minerals is applicable to all entities in NV Bekaert SA and its wholly and majority owned subsidiaries. Joint ventures in which Bekaert has a minority shareholding are strongly encouraged to apply the procedure.

4. DEFINITIONS/ABBREVIATIONS

SEC – U.S. Securities and Exchange Commission

CFSI – Conflict - Free Sourcing Initiative

CMRT – Conflict Minerals Reporting Template

5. SUMMARY OF RESPONSIBILITIES

The Central Purchasing Department in cooperation with the local purchasing teams and the Central Quality Department are responsible for the communication and liaison with the suppliers, including the reporting and monitoring of supplier compliance on conflict minerals.

6. BACKGROUND

Bekaert believes that economic success and a commitment to sustainable business are not contradictory but go hand in hand, better together. Bekaert's global sustainability strategy is centered on four main pillars: our responsibility in the workplace, in the marketplace, towards the environment and towards society. Our efforts and activities are focused in such a way that balanced consideration is given to the interests of all respective stakeholders, i.e. employees, customers, suppliers, shareholders, partners, local governments and the communities in which we are active.

To this end, Bekaert requires that its suppliers adhere to high social, quality, environmental and ethical standards. Bekaert has issued a Supplier Code of Conduct available on the Bekaert website in different languages, which outlines the minimum requirements to be met by our suppliers regarding fair business practices and ethics, labor practices, impact on the environment and health and safety performance. Bekaert requires every supplier to sign the [Bekaert Supplier Code of Conduct](#) or to provide evidence that their own equivalent Code of Conduct covers the same principles. Each supplier is strongly encouraged to apply this practice with their suppliers, upstream in the supply chain.

Responding to the Bekaert obligations with respect to conflict minerals is part of Bekaert's social corporate responsibility. The rules regarding the reporting and disclosure requirements related to 'Conflict Minerals' (tin (Sn), tungsten (W), tantalum (Ta) and gold (Au)) are directed by the Dodd-Frank Wall Street Reform and Consumer Protection Act, Section 1502.

7. OUR COMMITMENTS

Bekaert is committed to ensure that all components, parts and materials used to manufacture its products contain minerals from conflict-free sources.

Bekaert is committed not to buy any products and materials containing Conflict Minerals directly from Conflict Mines in the Democratic Republic of Congo and the adjoining countries named in the Act.

Indirectly, Bekaert requires its suppliers to work towards ensuring that any Conflict Minerals supplied to Bekaert are not sourced from Conflict Mines in the Democratic Republic of Congo and the adjoining countries named in the Act.

Bekaert is committed to engage with its suppliers regarding their disclosure obligations and requests in this respect towards Bekaert.

8. OUR ACTIONS AND OUR REQUIREMENTS TOWARDS OUR SUPPLIERS

In continuously working towards these commitments,

- Bekaert included the requirements into the [Bekaert Supplier Code of Conduct](#) to reflect this policy.
- Bekaert requires its suppliers to provide components, parts or materials containing tantalum, tin, tungsten, and/or gold from Conflict-free sources only. Components, parts or materials which either directly or indirectly contribute to conflict, are unacceptable.
- Bekaert engages with suppliers so that they respond in a timely manner to Bekaert requests for evidence of compliance.
- Bekaert requires its suppliers to implement a policy regarding Conflict Minerals and to exercise due diligence to investigate the source of these minerals and to demonstrate evidence hereof to Bekaert on request.
- Bekaert requires its direct suppliers to define, implement and communicate to their suppliers their own policies, outlining their commitments to responsible sourcing, legal compliance and measure for implementation.
- Bekaert requires its direct suppliers to create transparency and traceability on their minerals sourcing flows.
- Bekaert requires its suppliers to complete the latest version of the Conflict Minerals Reporting Template (CMRT) of the CFSI (www.conflictsourcing.org) for the datasheets : Declaration, Smelter List (if applicable) and Product List and the Bekaert Supplier Declaration regarding Conflict Minerals within one month after request date from the Purchasing Department. The request will be sent once a year at the beginning of the year.

9. GRIEVANCE MECHANISM AND REPORTING

This policy will be reviewed regularly and updated as needed. Our employees, suppliers and other parties can report concerns and alleged violations of this Policy to conflict.minerals@bekaert.com.

Reports can be made anonymously, will be kept confidential to the fullest extent practicable and allowed by law. No employee will suffer as a consequence of reporting a concern or breach. Our suppliers are encouraged to contact their regular sourcing channel if they wish to seek guidance on the application of this Policy.

10. CORRECTIVE ACTIONS

Bekaert reserves the right to disengage from suppliers who do not meet the requirements as set forth by the Bekaert Policy on Conflict Minerals or who are not committed to disclose any information on their suppliers or smelters within the requested due date.

11. REFERENCES/ANNEX

[The Bekaert Supplier Code of Conduct](#)

[The Bekaert Supplier Code of Conduct – Compliance form](#)

Both documents are available on the Bekaert Website – Suppliers – [The Bekaert Supplier Code of Conduct](#) is available in different languages.